

# EXHIBIT B

## **DECLARATION OF STEVE BERGER**

My name is Steve Berger. I have first-hand knowledge of the following events:

1. I am the founding Pastor of Grace Chapel in Leipers Fork, Tennessee.
2. In January of 2021, I completed a three-year long transition out of the role of Senior Pastor of Grace Chapel and now serve in the role of Founding Pastor. I also serve on Grace Chapel's Elder Board and still preach there occasionally.
3. I have learned that a group of social media accounts known as #freedomforgracie (the "Accounts") have made public allegations that Grant Solomon met with me and shared information that his sister was sexually abused by her father, Aaron Solomon, and that the family lived in fear of him.
4. The Accounts have further alleged that I and Grace Chapel failed Gracie Solomon and her family because I did not report these allegations to the authorities.
5. The Accounts' allegations are untrue.
6. I did meet with Grant Solomon on or about May 8, 2018, at 11:30 am. We met privately in my office.
7. Our conversation consisted of a discussion of spiritual matters, namely how Grant could grow closer to Christ.
8. At no time in this meeting (or otherwise) did Grant report to me any sexual abuse allegations of any kind involving his sister, his father, or any other person.
9. At no time in this meeting (or otherwise) did Grant express to me that he was afraid of his father or that his father had abused him or Gracie in any way whatsoever.

10. As a mandatory reporter, I would have had the obligation to report any allegation of abuse to the proper authorities. I take this responsibility very seriously and would have promptly reported any such allegations if they had been made.

11. At some point after my meeting with Grant, I learned that Angie Solomon had reported allegations of abuse to an employee of Grace Chapel on April 30, 2018. That employee accompanied Ms. Solomon to the Williamson County Sherriff's Department to make a report of the allegations on May 4, 2018, and an investigator was assigned to the case. At no time did Grant mention anything to me about his mother's trip to the Sherriff's Department or any claims of abuse.

12. Upon Grant's death from a tragic accident on July 20, 2020, the family asked me to speak at his funeral, which I did.

13. The family held Grant's funeral at Grace Chapel.

14. The family rode with me from the funeral to the cemetery.

15. I am also told that the GoFundMe campaign related to the Accounts indicated that I had donated \$10. I did not make that donation and any statement or implication that I did so is false.

16. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated this 14 day of June, 2021.

  
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Steve Berger

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